



Meeting the OMB Policy Deadline

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**OMB policies issued
12/17/04 reference
laws that apply to
federal public
websites and add
new requirements
we all must meet by
12/31/05**



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EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
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M-05-04

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Clay Johnson III
Deputy Director for Management

SUBJECT: Policies for Federal Agency Public Websites

The efficient, effective, and appropriately consistent use of Federal agency public websites is important to promote a more citizen centered government. This memorandum and attachment fulfill the requirements of section 207(f) of the E-Government Act of 2002 (Pub. L. No. 107-347). Overall, the management of agencies' public websites should be in compliance with Federal information resource management law and policy.

Federal agency public websites are information resources funded in whole or in part by the Federal government and operated by an agency, contractor, or other organization on behalf of the agency. They present government information or provide services to the public or a specific non-Federal user group and support the proper performance of an agency function. Federal agency public websites are also information dissemination products as defined in Office of Management and Budget (OMB) Circular A-130, "Management of Federal Information Resources." Agencies must manage Federal agency public websites as part of their information resource management program following guidance in OMB Circular A-130, OMB "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies" (67 FR 5365), this memorandum, and other information policy issuances.

OMB expects prompt and orderly implementation of the policies in this memorandum and its attachment. OMB expects agencies to become fully compliant with new requirements by 12/31/05 and continue to adhere to existing requirements. OMB will monitor agency compliance with these policies as part of its oversight of agency information resource management programs. The recommendations and best practices published by the Interagency Committee on Government Information (<http://www.webcontent.gov>) will aid your implementation of the policies outlined in the attachment.

If you have any questions regarding this memorandum, please contact Kimberly Nelson (202) 395-3787 Knelson@omb.eop.gov, or Daniel Costello (202) 395-7857 Dcostello@omb.eop.gov, Policy Analysts, Information Policy and Technology Branch, Office of Management and Budget.

Attachment



The Mandate

OMB expects prompt and orderly implementation of the policies in this memorandum and its attachment. OMB expects agencies to become fully compliant with new requirements by 12/31/05 and continue to adhere to existing requirements. OMB will monitor agency compliance with these policies as part of its oversight of agency information resource management programs. The recommendations and best practices published by the Interagency Committee on Government Information (<http://www.webcontent.gov>) will aid your implementation of the policies outlined in the attachment.

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Cover memo cites recommendations and best practices on webcontent.gov to implement the policies...so if you implement the recommendations, you should be fine



The Strategy

- 1. Understand what you have to do**
- 2. Figure out what you've already done**
- 3. Sort the rest into two piles:**
 - Things you can do quickly – do them!**
 - Things that may take awhile – start the process**
- 4. Elevate potential issues NOW – don't wait until the E-Gov report is due**



Step 1: Understand what you have to do

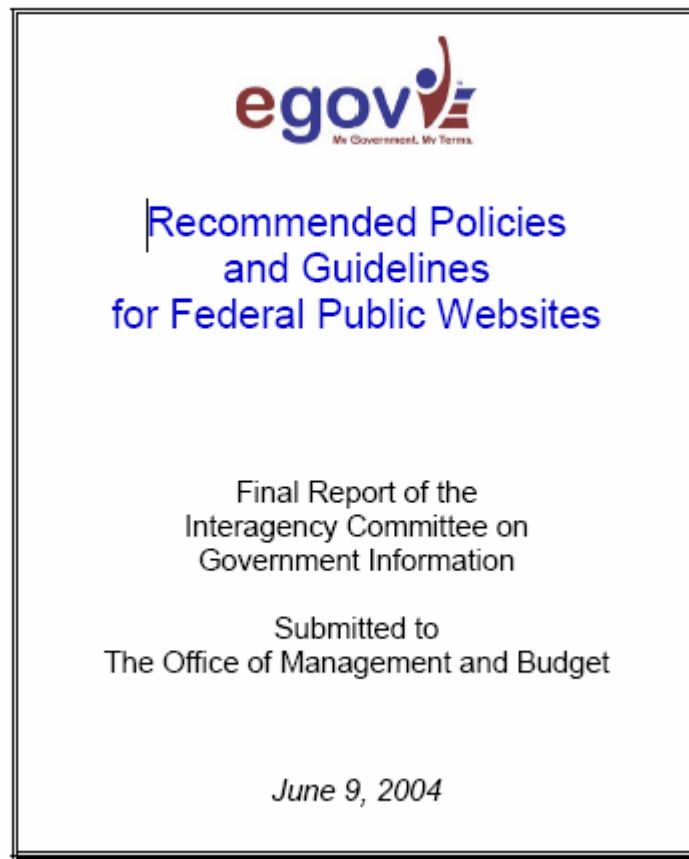
Helpful Hints:

1. Read the ICGI report

- <http://www.cio.gov/documents/ICGI/ICGI-June9report.pdf>



Read the ICGI report





Step 1: Understand what you have to do

Helpful Hints

2. Review the crosswalk between the OMB policies and the ICGI recommendations



Review the crosswalk

Implementing the New OMB Policies for Federal Public Websites

OMB issued new policies for Federal public websites on December 17, 2004. Following is guidance on implementing those policies developed by the Interagency Committee on Government Information (ICGI).

OMB Policy	Implementation Guidance
<p>1. Establish and maintain information dissemination product inventories, priorities, and schedules</p> <p>a. Your agency is already required under OMB Circular A-130 and the Paperwork Reduction Act to disseminate information to the public in a timely, equitable, efficient and appropriate manner and to maintain inventories of information dissemination products</p> <p>b. Section 207 of the E-Government Act requires your agency to develop priorities and schedules for making government information available and accessible to the public, in accordance with public comment, and to post this information on your agency's website. Section 207 also requires your agency to report to OMB, as part of the agency's annual E-Government Act report, the final determinations of inventories, priorities, and schedules your agency has made.</p> <p>c. Your agency must also post to your agency's website any updates to your agency's final determination of inventories, priorities, and schedules and include this information in your agency's annual E-Government Act report.</p>	<ul style="list-style-type: none"> • Use suggested procedures for establishing priorities and schedules for posting content: http://www.firstgov.gov/webcontent/req6g.shtml • Provide access to documents in different file formats: http://www.firstgov.gov/webcontent/req3c.shtml • Provide access for people with disabilities: http://www.firstgov.gov/webcontent/req6c.shtml • Provide access to people with limited English proficiency: http://www.firstgov.gov/webcontent/req6f.shtml • Provide common access to a broad range of visitors: http://www.firstgov.gov/webcontent/req3a.shtml • Provide dates and ensure content is current: http://www.firstgov.gov/webcontent/req1d.shtml • Organize content according to citizen needs: http://www.firstgov.gov/webcontent/req2a.shtml • Use basic common content and placement: http://www.firstgov.gov/webcontent/req2d.shtml <ul style="list-style-type: none"> o Contact information o Site Map or Subject Index o Common or Frequently Asked Questions o Online Services o Forms and Publications o Jobs o Information about Regulations o Information about Grants and Contracts • Measure customer satisfaction and usability: http://www.firstgov.gov/webcontent/req2e.shtml • Write and organize homepage from the viewpoint of the public: http://www.firstgov.gov/webcontent/req2b.shtml



Step 1: Understand what you have to do

Helpful Hints:

3. Review the web implications of OMB A-130



Implications of OMB A-130

MAJOR IMPLICATIONS OF OMB CIRCULAR A-130 FOR FEDERAL WEB CONTENT MANAGERS

Following is a brief summary of key sections of OMB A-130 that pertain to web management and suggestions for the impact on Web Managers
For a copy of the complete Circular, OMB A-130, Management of Federal Information Resources, visit:

<http://www.whitehouse.gov/omb/circulars/a130/a130trans4.html>

OMB A-130 Section	What It Says	What It Means to Web Managers
Section 7: Basic Considerations and Assumptions		
7a	The Federal Government is the largest single producer, collector, consumer, and disseminator of information in the United States. Because of the extent of the government's information activities, and the dependence of those activities upon public cooperation, the management of Federal information resources is an issue of continuing importance to all Federal agencies, State and local governments, and the public.	<ul style="list-style-type: none"> Your website(s) are a significant means for delivering government information to the public
7b	Government information is a valuable national resource. It provides the public with knowledge of the government, society, and economy -- past, present, and future. It is a means to ensure the accountability of government, to manage the government's operations, to maintain the healthy performance of the economy, and is itself a commodity in the marketplace.	<ul style="list-style-type: none"> This is a biggie! Government information is, itself, a product that we need to manage effectively. The public depends on our providing this product – and your website(s) can be one of the most efficient and effective ways to do that.
7c	The free flow of information between the government and the public is essential to a democratic society. It is also essential that the government <u>minimize</u> the Federal paperwork burden on the public, minimize the cost of its information activities, and maximize the usefulness of government information.	<ul style="list-style-type: none"> It is essential to provide information to and exchange information with the public, and our websites are an excellent means for this. We need to do our very best to manage our websites efficiently and effectively, to give the public the most "bang for the buck."
7d	In order to minimize the cost and maximize the usefulness of government information, the expected public and private benefits derived from government information should exceed the public and private costs of the information, recognizing that the benefits to be derived from government information may not always be quantifiable.	<ul style="list-style-type: none"> Though we can't always put a dollar amount on the value of the information on our websites to the public, we need to do our best to make sure that the cost of creating and managing our web content doesn't exceed the value.
7e	The nation can benefit from government information disseminated both	<ul style="list-style-type: none"> We should work with our partners – both government and private –



Step 1: Understand what you have to do

Helpful Hints:

- 4. Check out the implementation guidance on Webcontent.gov**

Review guidance on Webcontent.gov

The screenshot shows a Microsoft Internet Explorer browser window displaying the "OMB Policies for Federal Public Websites - Web Content Managers Toolkit" page. The address bar shows the URL: http://www.firstgov.gov/webcontent/policies_and_implementation.shtml. The page title is "OMB Policies for Federal Public Websites - Web Content Managers Toolkit - Microsoft Internet Explorer".

The page content includes a navigation bar with links: [Home](#), [About Us](#), [Subject Index](#), [Common Questions](#), and [Contact Us](#). Below the navigation bar, the main heading is "The Federal Web Content Managers Toolkit" with the subtitle "A Practical Guide for Managing U.S. Federal Public Websites".

The left sidebar contains two sections: "Topics" and "Tools". The "Topics" section lists links: [Laws, Regulations, and Policies](#), [OMB Policies](#), [How to Implement the OMB Policies](#), [Usability](#), [Governance](#), and [Metadata](#). The "Tools" section lists links: [Networks and Groups](#), [Content Manager Listserv](#), [Calendar](#), [Discussion Threads](#), [Job Openings](#), [Best Practices](#), [Library](#), [Workshops](#), and [Templates](#). Below the "Tools" section is a "Search" box with a "Go" button.

The main content area displays the heading "OMB Policies for Federal Public Websites" and a paragraph stating: "OMB issued Policies for Federal Public Websites on December 17, 2004. Below are links to each section of the policy memo. Under each section, you will find recommendations and best practices from the Interagency Committee on Government Information. As it said in OMB's cover memo, these recommendations and best practices will help you implement the OMB policies. **The deadline to comply with the policies is December 31, 2005.**"

Below the paragraph is a section titled "Browse the OMB Policies and Implementation Guidance (by Section)" with a list of 10 numbered links:

1. [Establish and Maintain Information Dissemination Product Inventories, Priorities, and Schedules](#)
2. [Ensure Information Quality](#)
3. [Establish and Enforce Agency-wide Linking Policies](#)
4. [Communicate with the Public and with State and Local Governments](#)
5. [Search Public Websites](#)
6. [Use Approved Domains](#)
7. [Implement Security Controls](#)
8. [Protect Privacy](#)
9. [Maintain Accessibility](#)
10. [Manage Records](#)

Below the list is a section titled "Browse Only the Implementation Guidance (by Topic)".



Step 2: Figure out what you've done

At HUD, we used this checklist to see which of the ICGI recommendations we had implemented – and which we had not

ICGI Web Content Policy and Guideline Recommendations		
Recommendation	Does HUD Do This?	
	Yes	No
1a. Use public domains (.gov, .mil, .fed.us)		
1b. Show U.S. sponsorship		
1c. Follow linking requirements: <ul style="list-style-type: none"> Linking policy posted on website Notification that visitors are leaving, Disclaimers for non-federal sites Established link review schedule stated in linking policy 		
1d. Must show that it is current		
2a. Organized for citizens and intended audiences (topics, audience groups, location)		
2b. Written/organized from audience point of view		
2c. No employee info		
2d. Common content/terminology <ul style="list-style-type: none"> Contact Us About HUD Site map or index Common questions Online services Forms/publications Jobs Regulations (link to regs.gov) Grants/contracts Required policies and links 		
2e. Evaluate customer satisfaction and usability		
3a. Provide common access		
3b. Plain language		
3c. Provide access in appropriate file formats		
3d. Provide appropriate access to data		
3e. Consistent navigation		
3f. Search engine on every page		
3g. Use standard metadata		
3h. Inform audiences of website changes		
3i. Ensure continuity during emergencies		
4a. Avoid duplication of other websites		
4b. Collaborate on cross-agency portals		
4c. Link to appropriate portals		
4d. Provide link back to homepage		
4e. Link to FirstGov		
5a. Develop and post priorities/schedule for posting new content		
5a. Comply with privacy requirements		
5b. Have security protocols		
5c. Ensure access for people with disabilities		
5d. Comply with FOIA requirements		
5e. Comply with Information Quality Guidelines		
5f. Provide access for people with limited English proficiency		
5g. Comply with Paperwork Reduction Act (OMB approval on forms/surveys)		
5h. Comply with Government Paperwork Elimination Act (electronic forms, etc.)		
5i. Comply with records management requirements		
5j. Comply with digital rights, copyright, trademark, and patent laws		
5k. Comply with Government Performance and Results Act (first annual performance		



Step 3: Sort into two piles

- Probably will find you've done more than you thought you had
- Make the quick fixes
 - ❖ Don't reinvent the wheel – beg, borrow, steal!
 - ❖ For example, linking policies – check out Webcontent.gov
 - ❖ Assign tasks and assign deadlines
- Now deal with the hard stuff



Policy 1

Establish and maintain information dissemination product inventories, priorities, and schedules

- Key words: “timely, equitable, efficient, appropriate”
- What could be hard
 - ❖ Provide access to documents in different file formats (equitable)
 - ❖ Provide access for people with disabilities (equitable) – watch those PDFs and Powerpoints!
 - ❖ Provide access to people with limited English proficiency (equitable)
 - ❖ Use plain language (appropriate)



Policy 2

Ensure information quality

- **Key words:** quality, objectivity, utility, integrity, timely, equitable
- **What could be hard**
 - ❖ **Quality** – challenges us to post only information that we know to be accurate and to inform the public if we are not sure
 - ❖ **Objectivity** – challenges us to keep information and services balanced



Policy 3

Establish and enforce agency-wide linking policies

- Key points: Links, quality of information, and – again - objectivity
- Concerned about
 - ❖ Linking to information that may not be accurate
 - ❖ Keeping web content “objective”
 - ❖ Ensuring certain information is available on all websites
- What could be hard
 - ❖ Need to be sure you have procedures to monitor links
 - ❖ Need to be sure you’re linking to all required info and sites



Policy 4

Communicate with the public, state and local governments

■ Talk to your audiences

- ❖ Know what they want and need; and provide it

■ What could be hard

- ❖ Measure customer satisfaction and usability and use results to improve your website
- ❖ Lots of help – check out webcontent.gov and usability.gov



Policy 5

Search public websites

■ Keys

- ❖ Have a search function or (for smaller sites) a site index or map
- ❖ Watch file formats
- ❖ Create data so it can be combined and sorted - metadata, XML schemas can help

■ What could be hard

- ❖ Establish search standards
- ❖ Use standard metadata
- ❖ Additional policies or guidance may be coming in December



Policy 6

Use approved domains

- Very important – federal websites not on .gov or .mil or .fed.us must be moved to .gov or .mil or .fed.us
 - ❖ Also refers to “sponsorship” and the importance of showing government sponsorship
 - ❖ Usability testing showed URLs are very important in establishing public trust
- What could be hard
 - ❖ This is the one that is causing most distress for agencies that have not controlled domains



Policy 7

Implement security controls

- Security - not exactly a content issue – but important for content managers and contributors to know
- What could be hard
 - ❖ Need to consult with your CIO to make sure controls are in place



Policy 8

Protect privacy

- Privacy – not new...just re-emphasized
- What could be hard
 - ❖ Make sure you do what you say you'll do



Policy 9

Maintain accessibility

- **Accessibility – also not new**
 - ❖ 508 policies already well-known
 - ❖ Lots of guidance on www.access-board.gov
- **What could be hard**
 - ❖ LEP – could present challenges for web managers
 - ❖ Accessibility also applies to people with low bandwidth, people who don't own certain proprietary software



Policy 10

Manage records

- Establish procedures to handle web records
 - ❖ NARA is creating a website to showcase best practices

- What could be hard
 - ❖ Setting up a process to make sure web pages that are records are transferred in a timely manner



OMB policies cite OMB A-130 throughout...
...you need to know it and understand it



OMB A-130

How Does It Relate?

Section 7b

- **What It Says:** Government information is a valuable national resource. It provides the public with knowledge of the government, society, and economy -- **past, present, and future**. It is a means to ensure the accountability of government, to manage the government's operations, to maintain the healthy performance of the economy, and **is itself a commodity in the marketplace**.
- **What It Means:**
 - ❖ This is a biggie! Government information is, itself, a product that we need to manage effectively
 - ❖ It also underscores the need to maintain historical information across administrations



OMB A-130

How Does It Relate?

■ Section 7d

- ❖ **What It Says:** In order to minimize the cost and maximize the usefulness of government information, the expected public and private benefits derived from government information should exceed the public and private costs of the information, recognizing that the benefits to be derived from government information may not always be quantifiable.
- ❖ **What It Means:** We can't always put a dollar amount on the value of our information, but we need to make sure the cost of creating and managing web content doesn't exceed the value
 - **Gerry McGovern:** If 99% of web audience is using 1% of the website, are you really investing your resources properly?



OMB A-130

How Does It Relate?

Section 7j

- **What It Says:** Because state and local governments are important producers of government information for many areas such as health, social welfare, labor, transportation, and education, the federal government must cooperate with these governments in the management of information resources.
- **What It Means:** Work with state and local governments to trade links, combine content, and eliminate duplication



OMB A-130

How Does It Relate?

Section 8(a) (1) (b)

■ **What It Says:** Consider the effects of actions on members of the public and ensure consultation with the public as appropriate

■ **What It Means:**

- ❖ Reach out to the public to find out what they want on your website
- ❖ Listen to the feedback you are receiving from the public
- ❖ Measure usability and customer satisfaction and use it to improve your website



OMB A-130

How Does It Relate?

Section 8(a) (1)(d)

What It Says: Seek to satisfy new information needs through interagency or intergovernmental sharing of information, or through commercial sources, where appropriate, before creating or collecting new information

What It Means:

- Avoid duplication - create content once and use it many times through links
- Collaborate with other organizations or agencies on content
- Develop cross-agency websites as appropriate
- Use metadata and XML schemas across government to help aggregate information on the same subject or for the same audience



OMB A-130

How Does It Relate?

Section 8(a) (1) (k)(2)

- **What It Says:** Agencies must collect or create only that information necessary for the proper performance of agency functions and which has practical utility
- **What It Means:**
 - ❖ Web content must be mission-related



OMB A-130

How Does It Relate?

Section 8(a) (1) (k)(2)

- **What It Says:** Consider whether an information dissemination product available from other Federal or nonfederal sources is equivalent to an agency information dissemination product and reasonably fulfills the dissemination responsibilities of the agency
- **What It Means:**
 - ❖ Do not duplicate efforts. Link, link, link
 - ❖ Work with the other agencies to develop one source for the content



Step 4: Elevate issues NOW!

- **Your CIO will have to report compliance in annual E-Gov report (normally in early December)**
- **If there are policies you can't meet – tell your bosses now**
- **At a minimum, have a plan in place**



Where can you get help?

- ❖ Join the Web Content Managers Forum
 - Sign up through webcontent.gov
- ❖ Visit webcontent.gov...often!
- ❖ Build local networks across agencies



Questions? Comments?

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